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15 Attorneys for Plaintiff

16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

19 **CANH LE,**

20 **Plaintiff,**

21 **v.**

22 **DIRECTV, LLC,**

23 **Defendant.**

24 **Case No. 16-cv-01369 SVW-AS**

25 **DECLARATION OF J. TOJI**
26 **CALABRO IN OPPOSITION TO**
27 **DEFENDANT'S MOTION FOR**
28 **SUMMARY ADJUDICATION**
REGARDING FLSA CLAIMS AND
DAMAGES

Date: September 11, 2017

Time: 1:30 p.m.

Courtroom: 10A

Hon. Stephen V. Wilson

1 I, J. Toji Calabro, declares as follows:

2 1. I am an attorney at Stueve Siegel Hanson LLP, one of the attorneys
3 for Plaintiffs in the above-entitled action and related cases¹, and I make this
4 declaration based on my own personal knowledge.

5 2. A true and correct copy of the cited portions of the transcript of the
6 deposition of Paul Guzik taken on 12/9/16 in the CDCA cases is attached and
7 incorporated herein as Exhibit 132.

8 3. A true and correct copy of the cited portions of Plaintiff Paul Guzik's
9 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached
10 and incorporated herein as Exhibit 133.

11 4. A true and correct copy of the cited portions of the transcript of the
12 deposition of Armando Solis Juarez taken on 12/13/16 in the CDCA cases is
13 attached and incorporated herein as Exhibit 134.

14 5. A true and correct copy of the cited portions of Plaintiff Armando Soli
15 Juarez's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is
16 attached and incorporated herein as Exhibit 135.

17 6. A true and correct copy of the cited portions of the transcript of the
18 deposition of Jeffrey Kidd taken on 11/29/16 in the CDCA cases is attached and
19 incorporated herein as Exhibit 136.

20 7. A true and correct copy of the cited portions of Plaintiff Jeffrey
21 Kidd's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is
22 attached and incorporated herein as Exhibit 137.

23 _____
24 ¹ "Plaintiffs" are Canh Le (Case No. 2:16-cv-01369-SVW-AS), Jeremy Lasater
25 (Case No. 2:16-cv-01373-SVW-AS), David Varas (Case No. 2:16-cv-01395-
26 SVW-AS), Mendamar Lkhagvadorj (Case No. 2:16-cv-01502-SVW-AS), Henry
27 Trujeque (Case No. 2:16-cv-01477-SVW-AS), Paul Guzik (Case No. 2:16-cv-
28 01967-SVW-AS), Jeffrey Kidd (Case No. 2:16-cv-01506-SVW-AS), Armando
Solis Juarez (Case No. 5:16-cv-00400-SVW-AS), and Jamie Nault (Case No. 2:16-
cv-05721-SVW-AS) (collectively, the "related cases").

1 8. A true and correct copy of the cited portions of the transcript of the
2 deposition of Jeremy Lasater taken on 10/20/16 in the CDCA cases is attached and
3 incorporated herein as Exhibit 138.

4 9. A true and correct copy of the cited portions of Plaintiff Jeremy
5 Lasater's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is
6 attached and incorporated herein as Exhibit 139.

7 10. A true and correct copy of the cited portions of the transcript of the
8 deposition of Canh Le taken on 10/14/16 in the CDCA cases is attached and
9 incorporated herein as Exhibit 140.

10 11. A true and correct copy of the cited portions of Plaintiff Canh Le's
11 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached
12 and incorporated herein as Exhibit 141.

13 12. A true and correct copy of the cited portions of the transcript of the
14 deposition of Mendamar Lkhagvadorj taken on 11/2/16 in the CDCA cases is
15 attached and incorporated herein as Exhibit 142.

16 13. A true and correct copy of the cited portions of Plaintiff Mendamar
17 Lkhagvadorj's 3/22/2016 Responses to DIRECTV, LLC's First Set of
18 Interrogatories is attached and incorporated herein as Exhibit 143.

19 14. A true and correct copy of the cited portions of the transcript of the
20 deposition of Jaime Nault taken on 12/5/16 in the CDCA cases is attached and
21 incorporated herein as Exhibit 144.

22 15. A true and correct copy of the cited portions of Plaintiff Henry
23 Trujeque's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories
24 is attached and incorporated herein as Exhibit 145.

25 16. A true and correct copy of the cited portions of the transcript of the
26 deposition of David Varas taken on 10/24/16 in the CDCA cases is attached and
27 incorporated herein as Exhibit 146.

1 17. A true and correct copy of the cited portions of Plaintiff David Varas'
2 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached
3 and incorporated herein as Exhibit 147.

4 18. A true and correct copy of a document produced by DIRECTV to
5 Plaintiffs labeled DIRECTV_GENERAL0000042660 is attached and incorporated
6 herein as Exhibit 148.

7 19. A true and correct copy of the cited portions of the transcript of the
8 deposition of Christopher Altomari taken in the *Arnold v. DIRECTV, LLC* on
9 3/5/2015 is attached and incorporated herein as Exhibit 149.

10 20. A true and correct copy of a document produced by DIRECTV to
11 Plaintiffs labeled DTV-CDCA00026747 is attached and incorporated herein as
12 Exhibit 150.

13 21. A true and correct copy of a document produced by DIRECTV to
14 Plaintiffs labeled DTV-CDCA00027462 is attached and incorporated herein as
15 Exhibit 151.

16 22. A true and correct copy of a document produced by DIRECTV to
17 Plaintiffs labeled DTV-GLOBAL00376794 is attached and incorporated herein as
18 Exhibit 152.

19 23. A true and correct copy of the cited portions of the transcript of the
20 deposition of Marc Mastin taken on 11/11/15 in the CDCA cases is attached and
21 incorporated herein as Exhibit 153.

22 24. A true and correct copy of a document produced by DIRECTV to
23 Plaintiffs labeled DTV-CDCA00030877 is attached and incorporated herein as
24 Exhibit 154.

25 25. A true and correct copy of a document produced by DIRECTV to
26 Plaintiffs labeled DTV-CDCA00030974 is attached and incorporated herein as
27 Exhibit 155.

1 26. A true and correct copy of the cited portions of the transcript of the
2 deposition of Kyle Wells taken on 9/11/15 in *Arndt v. DIRECT, LLC* is attached
3 and incorporated herein as Exhibit 156.

4 27. A true and correct copy of the cited portions of the transcript of the
5 deposition of William Bennett taken on 12/6/16 in the CDCA cases is attached and
6 incorporated herein as Exhibit 157.

7 28. A true and correct copy of the cited portions of the transcript of the
8 deposition of Matt Gray taken on 2/22/17 in the CDCA cases is attached and
9 incorporated herein as Exhibit 158.

10 29. A true and correct copy of the cited portions of the transcript of the
11 deposition of Mary Ellen Baumgardt taken on 7/13/2011 in *Arnold v. DIRECTV,*
12 *Inc.*, is attached and incorporated herein as Exhibit 159.

13 30. A true and correct copy of a document produced by DIRECTV to
14 Plaintiffs labeled DTV-CDCA00028925 is attached and incorporated herein as
15 Exhibit 160.

16 31. A true and correct copy of the confidential cited portions of the
17 transcript of the deposition of David Baker taken on 3/22/17 in the CDCA cases is
18 attached and incorporated herein as Exhibit 161.

19 32. A true and correct copy of a document produced by DIRECTV to
20 Plaintiffs labeled DTV-GLOBAL00090676 is attached and incorporated herein as
21 Exhibit 162.

22 33. A true and correct copy of a document produced by DIRECTV to
23 Plaintiffs labeled DTV-CA_GUZZIK_000143 is attached and incorporated herein as
24 Exhibit 163.

25 34. A true and correct copy of a document produced by DIRECTV to
26 Plaintiffs labeled DTV-CDCA00004341 is attached and incorporated herein as
27 Exhibit 164.
28

1 35. A true and correct copy of a document produced by DIRECTV to
2 Plaintiffs labeled DTV-CDCA00018711 is attached and incorporated herein as
3 Exhibit 165.

4 36. A true and correct copy of a document produced by DIRECTV to
5 Plaintiffs labeled DTV-CA_JUAREZ_000107 is attached and incorporated herein
6 as Exhibit 166.

7 37. A true and correct copy of a document produced by DIRECTV to
8 Plaintiffs labeled DTV-CA_LE_000050 is attached and incorporated herein as
9 Exhibit 167.

10 38. A true and correct copy of a document produced by DIRECTV to
11 Plaintiffs labeled DTV-CA_NAULT_000150 is attached and incorporated herein
12 as Exhibit 168.

13 39. A true and correct copy of a document produced by DIRECTV to
14 Plaintiffs labeled DTV-CA_VARAS_000056 is attached and incorporated herein
15 as Exhibit 169.

16 40. A true and correct copy of the cited portions of the transcripts of the
17 depositions of Maria Shropshire taken on 10/28/16 and 11/4/16 in the CDCA cases
18 are attached and incorporated herein as Exhibit 170.

19 41. A true and correct copy of the cited portions of the transcripts of the
20 deposition of Henry Trujeque taken on 11/1/16 in the CDCA cases is attached and
21 incorporated herein as Exhibit 171.

22 42. A true and correct copy of the cited portions of the transcripts of the
23 deposition of Paul Yang taken on 4/26/17 in the CDCA cases is attached and
24 incorporated herein as Exhibit 172.

25 43. A true and correct copy of a document produced by DIRECTV to
26 Plaintiffs labeled DTV-CDCA00015666 is attached and incorporated herein as
27 Exhibit 173.

1 44. A true and correct copy of the cited portions of the transcripts of the
2 deposition of Deshon Gipson taken on 4/19/17 in the CDCA cases are attached and
3 incorporated herein as Exhibit 174.

4 45. A true and correct copy of the cited portions of the transcripts of the
5 deposition of Kyle Wells taken on 11/11/15 in the *Field v. DIRECTV, LLC* is
6 attached and incorporated herein as Exhibit 175.

7 46. A true and correct copy of a document produced by DIRECTV to
8 Plaintiffs labeled DTV-CA_GUZZIK_000211 is attached and incorporated herein as
9 Exhibit 176.

10 47. A true and correct copy of a document produced by DIRECTV to
11 Plaintiffs labeled DTV-CA_GUZZIK_000212 is attached and incorporated herein as
12 Exhibit 177.

13 48. A true and correct copy of a document produced by DIRECTV to
14 Plaintiffs labeled DTV-CA_JUAREZ_000184 is attached and incorporated herein
15 as Exhibit 178.

16 49. A true and correct copy of a document produced by DIRECTV to
17 Plaintiffs labeled DTV-CA_KIDD_000166 is attached and incorporated herein as
18 Exhibit 179.

19 50. A true and correct copy of a document produced by DIRECTV to
20 Plaintiffs labeled DTV-CA_LASATER_000219 is attached and incorporated
21 herein as Exhibit 180.

22 51. A true and correct copy of a document produced by DIRECTV to
23 Plaintiffs labeled DTV-CA_LE_000101 is attached and incorporated herein as
24 Exhibit 181.

25 52. A true and correct copy of a document produced by DIRECTV to
26 Plaintiffs labeled DTV-CA_LKHAGVADORJ_000156 is attached and
27 incorporated herein as Exhibit 182.

53. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA_LKHAGVADORJ_000132 is attached and incorporated herein as Exhibit 183.

54. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA_NAULT_000210 is attached and incorporated herein as Exhibit 184.

55. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA_NAULT_000211 is attached and incorporated herein as Exhibit 185.

56. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA_TRUJEQUE_000288 is attached and incorporated herein as Exhibit 186.

57. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA_VARAS_000152 is attached and incorporated herein as Exhibit 187.

58. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00013542 is attached and incorporated herein as Exhibit 188.

59. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00007112 is attached and incorporated herein as Exhibit 189.

60. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00009842 is attached and incorporated herein as Exhibit 190.

61. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00008699 is attached and incorporated herein as Exhibit 191.

1 62. A true and correct copy of a document produced by DIRECTV to
2 Plaintiffs labeled DTV-CDCA00024334 is attached and incorporated herein as
3 Exhibit 192.

4 63. A true and correct copy of a document produced by DIRECTV to
5 Plaintiffs labeled DTV-GLOBAL00133759-60 is attached and incorporated herein
6 as Exhibit 193.

7 64. A true and correct copy of a document produced by DIRECTV to
8 Plaintiffs labeled DTV-GLOBAL00449907-08 is attached and incorporated herein
9 as Exhibit 194.

10 65. A true and correct copy of a document produced by DIRECTV to
11 Plaintiffs labeled DTV-Global00086921 and marked as Ex. 9 during the deposition
12 of Adrian Dimech taken 11/3/16 in the CDCA cases is attached and incorporated
13 herein as Exhibit 195.

14 66. A true and correct copy of a document produced by Plaintiffs to
15 DIRECTV labeled PLTF-TRUJEQUE00000312 and marked as Exhibit 2 during
16 the deposition of Paul Yang taken on 4/26/17 in the CDCA cases is attached and
17 incorporated herein as Exhibit 196.

18 67. A true and correct copy of a document produced by DIRECTV to
19 Plaintiffs labeled DIRECTV-Roeder00008707-08 is attached and incorporated
20 herein as Exhibit 197.

21 68. A true and correct copy of a document produced by DIRECTV to
22 Plaintiffs labeled DIRECTV-Andersen031794, 96 is attached and incorporated
23 herein as Exhibit 198.

24 69. A true and correct copy of a document produced by DIRECTV to
25 Plaintiffs labeled DTV-GLOBAL00335358, 75 is attached and incorporated herein
26 as Exhibit 199.

1 70. A true and correct copy of a document produced by DIRECTV to
2 Plaintiffs labeled DTV-GLOBAL00426023, 47 is attached and incorporated herein
3 as Exhibit 200.

4 71. A true and correct copy of a document produced by DIRECTV to
5 Plaintiffs labeled DTV-CDCA00000473, 502 is attached and incorporated herein
6 as Exhibit 201.

7 72. A true and correct copy of a document produced by DIRECTV to
8 Plaintiffs labeled DTV-CDCA00001065, 95 is attached and incorporated herein as
9 Exhibit 202.

10 73. A true and correct copy of a document produced by DIRECTV to
11 Plaintiffs labeled DTV-CDCA00027595, 650 is attached and incorporated herein
12 as Exhibit 203.

13 74. A true and correct copy of a document produced by DIRECTV to
14 Plaintiffs labeled DTV-CDCA00000666, 703 is attached and incorporated herein
15 as Exhibit 204.

16 75. A true and correct copy of a document produced by DIRECTV to
17 Plaintiffs labeled DTV-GLOBAL00254287, 94 is attached and incorporated herein
18 as Exhibit 205.

19 76. A true and correct copy of a document produced by DIRECTV to
20 Plaintiffs labeled DTV-CDCA00004881, 915 is attached and incorporated herein
21 as Exhibit 206.

22 77. A true and correct copy of the confidential cited portions of the
23 transcript of the deposition of Adrian Dimech taken on 11/3/16 in the CDCA cases
24 is attached and incorporated herein as Exhibit 207.

25 78. A true and correct copy of the cited portions of the transcript of the
26 deposition of David Baker taken on 8/25/16 in the *Arndt v. DIRECTV, LLC* is
27 attached and incorporated herein as Exhibit 208.

1 79. A true and correct copy of the cited portions of the transcript of the
2 deposition of Drew Berryessa taken on 11/1/16 in the CDCA cases is attached and
3 incorporated herein as Exhibit 209.

4 80. A true and correct copy of the cited portions of the transcript of the
5 deposition of Michael Butao taken on 11/4/2016 in the CDCA cases is attached
6 and incorporated herein as Exhibit 210.

7 81. A true and correct copy of the cited portions of the transcript of the
8 deposition of Roy Cienfuegos taken on 11/10/16 in the CDCA cases is attached
9 and incorporated herein as Exhibit 211.

10 82. A true and correct copy of the cited portions of the transcript of the
11 deposition of Steven Crawford taken on 11/8/16 in the CDCA cases is attached and
12 incorporated herein as Exhibit 212.

13 83. A true and correct copy of the cited portions of the transcript of the
14 deposition of William McCarty taken on 10/21/16 in the CDCA cases is attached
15 and incorporated herein as Exhibit 213.

16 84. A true and correct copy of the cited portions of the transcript of the
17 deposition of Michael Perez taken on 4/14/17 in the CDCA cases is attached and
18 incorporated herein as Exhibit 214.

19 85. A true and correct copy of the cited portions of the transcript of the
20 deposition of David Baker taken *Arnold v. DIRECTV, LLC* on 5/21/15 is attached
21 and incorporated herein as Exhibit 215.

22 86. A true and correct copy of the cited portions of the transcript of the
23 deposition of Kyle Wells taken in *Andersen v. DIRECTV, LLC* on 5/24/16 is
24 attached and incorporated herein as Exhibit 216.

25 87. A true and correct copy of the cited portions of the transcript of the
26 deposition of Todd Bartlett taken in *Field v. DIRECTV, LLC* on 11/12/15 is
27 attached and incorporated herein as Exhibit 217.

1 88. A true and correct copy of a document produced by DIRECTV to
2 Plaintiffs labeled DTV-CDCA00022911 and marked as Ex. 38 during the
3 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and
4 incorporated herein as Exhibit 218.

5 89. A true and correct copy of a document produced by DIRECTV on
6 behalf of Christian Installation Group Inc to Plaintiffs labeled
7 CHRISTIANINSTALLATION_DTV000012 and marked as Exhibit 2 in the
8 deposition of Michael Perez taken on 4/14/17 in the CDCA cases is attached and
9 incorporated herein as Exhibit 219.

10 90. A true and correct copy of a document produced by Plaintiffs to
11 DIRECTV labeled PLTF-LASATER00002788 is attached and incorporated herein
12 as Exhibit 220.

13 91. A true and correct copy of the cited portions of the transcript of the
14 deposition of Todd Bartlett taken in *Andersen v. DIRECTV, LLC* on 5/24/16 is
15 attached and incorporated herein as Exhibit 221.

16 92. A true and correct copy of a document produced by DIRECTV to
17 Plaintiffs labeled DTV-CDCA00013089 is attached and incorporated herein as
18 Exhibit 222.

19 93. A true and correct copy of a document produced by DIRECTV to
20 Plaintiffs labeled DTV-CDCA00005873 and marked as Ex. 7 during the deposition
21 of David Baker taken on 3/22/17 in the CDCA cases is attached and incorporated
22 herein as Exhibit 223.

23 94. A true and correct copy of a document produced by Plaintiffs to
24 DIRECTV labeled PLTF-LASATER00002722 and marked as Exhibit 22 in the
25 deposition of Jeremy Lasater taken on 10/20/16 in the CDCA cases is attached
26 and incorporated herein as Exhibit 224.

1 95. A true and correct copy of a document produced by DIRECTV to
2 Plaintiffs labeled DTV-CA_Guzik00278 is attached and incorporated herein as
3 Exhibit 225.

4 96. A true and correct copy of a document produced by DIRECTV to
5 Plaintiffs labeled DTV-CA_Guzik00284 is attached and incorporated herein as
6 Exhibit 226.

7 97. A true and correct copy of a document produced by DIRECTV to
8 Plaintiffs labeled DTV-CA_Guzik00290 is attached and incorporated herein as
9 Exhibit 227.

10 98. A true and correct copy of a document produced by DIRECTV to
11 Plaintiffs labeled DTV-CA_Guzik00295 is attached and incorporated herein as
12 Exhibit 228.

13 99. A true and correct copy of a document produced by DIRECTV to
14 Plaintiffs labeled DTV-CA_Guzik00300 is attached and incorporated herein as
15 Exhibit 229.

16 100. A true and correct copy of a document produced by DIRECTV to
17 Plaintiffs labeled DTV-CA_Guzik00305 is attached and incorporated herein as
18 Exhibit 230.

19 101. A true and correct copy of a document produced by Plaintiffs to
20 DIRECTV labeled PLTF-KIDD00000005 is attached and incorporated herein as
21 Exhibit 231.

22 102. A true and correct copy of a document produced by Plaintiffs to
23 DIRECTV labeled PLTF-KIDD00001824 is attached and incorporated herein as
24 Exhibit 232.

25 103. A true and correct copy of a document produced by Plaintiffs to
26 DIRECTV labeled PLTF-KIDD00002015 is attached and incorporated herein as
27 Exhibit 233.

1 104. A true and correct copy of a document produced by Plaintiffs to
2 DIRECTV labeled PLTF-KIDD00002255 is attached and incorporated herein as
3 Exhibit 234.

4 105. A true and correct copy of a document produced by Plaintiffs to
5 DIRECTV labeled PLTF-KIDD00002452 is attached and incorporated herein as
6 Exhibit 235.

7 106. A true and correct copy of a document produced by Plaintiffs to
8 DIRECTV labeled PLTF-KIDD00002654 is attached and incorporated herein as
9 Exhibit 236.

10 107. A true and correct copy of a document produced by Plaintiffs to
11 DIRECTV labeled PLTF-KIDD00002827 is attached and incorporated herein as
12 Exhibit 237.

13 108. A true and correct copy of a document produced by Plaintiffs to
14 DIRECTV labeled PLTF-KIDD00003069 is attached and incorporated herein as
15 Exhibit 238.

16 109. A true and correct copy of a document produced by Plaintiffs to
17 DIRECTV labeled PLTF-KIDD00003353 is attached and incorporated herein as
18 Exhibit 239.

19 110. A true and correct copy of a document produced by Plaintiffs to
20 DIRECTV labeled PLTF-KIDD00003450 is attached and incorporated herein as
21 Exhibit 240.

22 111. A true and correct copy of a document produced by Plaintiffs to
23 DIRECTV labeled PLTF-KIDD00003469 is attached and incorporated herein as
24 Exhibit 241.

25 112. A true and correct copy of a document produced by Plaintiffs to
26 DIRECTV labeled PLTF-KIDD00003512 is attached and incorporated herein as
27 Exhibit 242.

1 113. A true and correct copy of a document produced by Plaintiffs to
2 DIRECTV labeled PLTF-KIDD00003715 is attached and incorporated herein as
3 Exhibit 243.

4 114. A true and correct copy of a document produced by Plaintiffs to
5 DIRECTV labeled PLTF-LASATER00002438-2540 is attached and incorporated
6 herein as Exhibit 244.

7 115. A true and correct copy of a document produced by Plaintiffs to
8 DIRECTV labeled PLTF-LASATER00002541-2549 is attached and incorporated
9 herein as Exhibit 245.

10 116. A true and correct copy of a document produced by Plaintiffs to
11 DIRECTV labeled PLTF-LASATER00002550-2633 is attached and incorporated
12 herein as Exhibit 246.

13 117. A true and correct copy of a document produced by DIRECTV to
14 Plaintiffs labeled DTV-CA_LE_000154 is attached and incorporated herein as
15 Exhibit 247.

16 118. A true and correct copy of a document produced by DIRECTV to
17 Plaintiffs labeled DTV-CA_LE_000157 is attached and incorporated herein as
18 Exhibit 248.

19 119. A true and correct copy of a document produced by DIRECTV to
20 Plaintiffs labeled DTV-CA_LE_000158 is attached and incorporated herein as
21 Exhibit 249.

22 120. A true and correct copy of a document produced by Plaintiffs to
23 DIRECTV labeled PLTF-LE00000024 is attached and incorporated herein as
24 Exhibit 250.

25 121. A true and correct copy of a document produced by Plaintiffs to
26 DIRECTV labeled PLTF-LKHAGVADORJ00000198 is attached and incorporated
27 herein as Exhibit 251.

1 122. A true and correct copy of a document produced by Plaintiffs to
2 DIRECTV labeled PLTF-LKHAGVADORJ00000199 is attached and incorporated
3 herein as Exhibit 252.

4 123. A true and correct copy of a document produced by Plaintiffs to
5 DIRECTV labeled PLTF-NAULT00000571 is attached and incorporated herein as
6 Exhibit 253.

7 124. A true and correct copy of a document produced by Plaintiffs to
8 DIRECTV labeled PLTF-NAULT00000604 is attached and incorporated herein as
9 Exhibit 254.

10 125. A true and correct copy of a document produced by Plaintiffs to
11 DIRECTV labeled PLTF-NAULT00000683 is attached and incorporated herein as
12 Exhibit 256.

13 126. A true and correct copy of a document produced by Plaintiffs to
14 DIRECTV labeled PLTF-NAULT00000574 is attached and incorporated herein as
15 Exhibit 257.

16 127. A true and correct copy of a document produced by Plaintiffs to
17 DIRECTV labeled PLTF-NAULT00000612 is attached and incorporated herein as
18 Exhibit 257.

19 128. A true and correct copy of a document produced by Plaintiffs to
20 DIRECTV labeled PLTF-JUAREZ00000040 is attached and incorporated herein
21 as Exhibit 258.

22 129. A true and correct copy of a document produced by Plaintiffs to
23 DIRECTV labeled PLTF-JUAREZ00000171 is attached and incorporated herein
24 as Exhibit 259.

25 130. A true and correct copy of a document produced by Plaintiffs to
26 DIRECTV labeled PLTF-JUAREZ00000197 is attached and incorporated herein
27 as Exhibit 260.
28

1 131. A true and correct copy of a document produced by Plaintiffs to
2 DIRECTV labeled PLTF-JUAREZ00000201 is attached and incorporated herein
3 as Exhibit 261.

4 132. A true and correct copy of a document produced by DIRECTV to
5 Plaintiffs labeled DTV-CA_TRUJEQUE_000257 is attached and incorporated
6 herein as Exhibit 262.

7 133. A true and correct copy of a document produced by DIRECTV to
8 Plaintiffs labeled DTV-CA_TRUJEQUE_000323-24 is attached and incorporated
9 herein as Exhibit 263.

10 134. A true and correct copy of a document produced by DIRECTV to
11 Plaintiffs labeled DTV-CA_TRUJEQUE_000262 is attached and incorporated
12 herein as Exhibit 264.

13 135. A true and correct copy of a document produced by Plaintiffs to
14 DIRECTV labeled PLTF-VARAS00000038 is attached and incorporated herein as
15 Exhibit 265.

16 136. A true and correct copy of a document produced by Plaintiffs to
17 DIRECTV labeled PLTF-VARAS00000040 is attached and incorporated herein as
18 Exhibit 266.

19 137. A true and correct copy of a document produced by Plaintiffs to
20 DIRECTV labeled PLTF-VARAS00000043 is attached and incorporated herein as
21 Exhibit 267.

22 138. A true and correct copy of the cited portions of the transcript of the
23 deposition of Cameron Malanify taken on 10/28/16 in the CDCA cases is attached
24 and incorporated herein as Exhibit 268.

25 139. A true and correct copy of a document produced by DIRECTV to
26 Plaintiffs labeled DTV-CDCA00029315 and marked as Ex. 34 during the
27
28

1 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and
2 incorporated herein as Exhibit 269.

3 140. A true and correct copy of a document produced by DIRECTV to
4 Plaintiffs labeled DTV-CDCA00024138 is attached and incorporated herein as
5 Exhibit 270.

6 141. A true and correct copy of a document produced by DIRECTV to
7 Plaintiffs labeled DTV_CDCA00015678 and marked as Ex. 45 during the
8 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and
9 incorporated herein as Exhibit 271.

10 142. A true and correct copy of a document produced by DIRECTV to
11 Plaintiffs labeled DTV-CDCA00013290 and marked as Ex. 15 during the
12 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and
13 incorporated herein as Exhibit 272.

14 143. A true and correct copy of a document produced by DIRECTV to
15 Plaintiffs labeled DTV-CDCA00014025 and marked as Ex. 44 during the
16 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and
17 incorporated herein as Exhibit 273.

18 144. A true and correct copy of a document produced by DIRECTV to
19 Plaintiffs labeled DTV-CDCA00027551 and marked as Ex. 10 during the
20 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and
21 incorporated herein as Exhibit 274.

22 145. A true and correct copy of a document produced by DIRECTV to
23 Plaintiffs labeled DTV-CDCA00008834 and marked as Ex. 12 during the
24 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and
25 incorporated herein as Exhibit 275.

146. A true and correct copy of Consent Judgment and Order filed on 10/7/15 in *Perez v. Lantern Light Corp.*, *DIRECTV, LLC* is attached and incorporated herein as Exhibit 276.

147. A true and correct copy of an email from Jonathan Slowik to J. Toji Calabro dated 11/18/2016 reaffirming Defendant document production issues raised at Lkhagvadorj's deposition taken 11/2/16 in the CDCA cases is attached and incorporated herein as Exhibit 277.

148. A true and correct copy of the cited portions of the transcript of the deposition of Steven Crawford taken on 10/13/15 in *Ardnt v. DIRECTV, LLC* is attached and incorporated herein as Exhibit 268.

149. A true and correct copy of the North American Industry Classification System Manual of 2017 is attached and incorporated herein as Exhibit 279.

150. A true correct copy of an email from J. Toji Calabro to Jonathan Slowik dated 6/23/17 responding to a question posed during a telephone conference conducted 6/23/17 is attached and incorporated herein as Exhibit 280.

151. A true and correct copy of a letter from J. Toji Calabro to Galit Knotz dated 10/5/16 memorializing telephone conference conducted 10/2/16 is attached and incorporated herein as Exhibit 281.

152. A true and correct copy of the Declaration of Plaintiff Jamie Nault filed on 9/11/17 in the CDCA cases is attached and incorporated herein as Exhibit 282.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 9, 2017 at Kansas City, Missouri.

s/J. Toji Calabro
J. Toji Calabro